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March 17, 1995

EPA Region 5 Records Ctr.



247015

Mr. Steve Faryan
United States Environmental Protection Agency
77 West Jackson Boulevard
HSE-5J
Chicago, Illinois 60604-3590

Re: Standard Scrap Metal/Chicago International Exporting

Dear Mr. Faryan:

Enclosed is a draft work plan for Standard Scrap, et al. We received estimates for sampling pursuant to your clarifications at the February 27, 1995 meeting which included weekly sampling (for eight weeks) of wastestreams which included scrap metal, copper fines, and fluff and two air monitors taking weekly samples for eight weeks. Samples were to be analyzed for PCBs, lead, and cadmium. The estimated costs received were about \$18,800.00. In light of other financial burdens imposed on our client, such an amount is clearly excessive when the conclusions to be drawn from such sampling is questionable at best.

Attached is EPA's Sampling Guidance for Scrap Metal Shredders in which EPA states that fluff sampling "is generally considered to be the most likely [shredder output stream] to contain PCBs." Thus, EPA TSCA people recommend fluff sampling to determine if PCBs are a problem at a scrap recycling facility. Note also that the Guidance understands the difference between fluff (a waste) and ferrous and non-ferrous metal (a recyclable stream). Based on this guidance, the enclosed Draft Work Plan only allows for PCB sampling of fluff and no other output streams.

We also fail to understand the purpose for TCLP lead and cadmium sampling. As I am sure you are aware, lead and cadmium are a problem in all the Chicago area. There is no way to assure that air samples will show a problem related to only the subject

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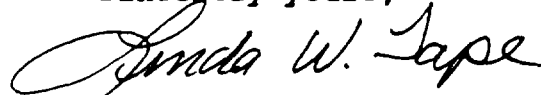
site. In light of the analytical costs of those samples, estimated at \$130.00 per sample, we have left such sampling out of the Draft Plan.

We have this same concern for air monitoring for PCBs since EPA removal work will be going on at the same time as the air sampling activity. Further, we have yet to find justification in the scientific arena for PCB air monitoring. We have included such monitoring in the work plan, but we believe it should be deleted. This is an item we need to discuss.

The sampling plan is limited to a three week schedule. A provision is included for EPA split samples. This will assure sample reliability. After the three week time, our client is willing to discuss ways to address any problems discovered.

We believe this draft Work Plan is a more sensible approach to the concerns of EPA's. Please call if you have any questions on the Draft Plan.

Sincerely yours,



Linda W. Tape

LWT/cn

Enclosures

cc: Mr. Lawrence Cohen
Mr. Steve Cohen
Joseph G. Nassif, Esq.
✓ Kurt Lindland, Esq.